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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 Oakland Division  
 No.: 4:20-cv-03919-CW**

**IN RE: COLLEGE ATHLETE  
 NIL LITIGATION**

**MOTION OF ATHLETES.ORG, INC.  
 FOR LEAVE TO FILE BRIEF OF AN  
 AMICUS CURIAE**

**NOW COMES ATHLETES.ORG., INC.**, by and through its attorneys, and hereby moves this Court for leave to file a Brief of an Amicus Curiae, and in support thereof, shows unto the Court the following:

1. Athletes.org, Inc. (“AO”) is a Non-Profit Corporation organized and existing under the laws of the State of Alabama with its principal office located in Birmingham, Alabama.

2. AO, also known as The Players Association for College Athletes, is a voluntary membership organization whose membership includes more than 4,000 current and former college

1 athletes, including some of the named Plaintiffs, and AO's purpose includes to support, educate  
2 and advocate for college and high school athletes on issues such as financial literacy, mental  
3 wellness, and name, image and likeness activities.

4 3. Some of AO's Members have already provided comments to this Court, and the  
5 interests of AO's Members will be impacted by the decisions made regarding whether to approve  
6 the proposed settlement in this case.

7 4. As a non-profit corporation whose purpose includes providing support for current  
8 and future college athletes that will be impacted by the decisions made regarding whether to  
9 approve the proposed settlement in this case, AO contends that an amicus brief from AO is  
10 desirable because AO believes that it can provide this Court with a balanced perspective regarding  
11 key clarifications that AO contends will be needed if the proposed settlement is to be approved.  
12 AO contends that it can illustrate to the Court issues that AO contends are not adequately addressed  
13 in the proposed settlement; other litigation that is likely to arise in the future surrounding issues in  
14 this case; and the need for college athletes to be adequately represented if they and college athletics  
15 are to secure the desired long-term stability that the Parties here apparently seek. Each of these  
16 matters is relevant, AO contends, to the disposition of this case and the proposed settlement.

17 5. AO has attached to this Motion its proposed Brief.

18 Respectfully submitted this the 27th day of March 2025

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22 **SHIPMAN WRIGHT & MOORE, LLP**  
*Attorneys for Athletes.org, Inc.*

23 By: /s/ Gary K. Shipman

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on March 27, 2025, I filed the foregoing with the Court by uploading to the CM/ECF system for the United States District Court for the Northern District of California and that a true and accurate copy was served on all Registered parties via Notice of Electronic Filing.

By: /s/ Gary K. Shipman

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**GARY K. SHIPMAN**